

EMERY CELLI BRINCKERHOFF ABADY WARD & MAAZEL LLP

RICHARD D. EMERY  
ANDREW G. CELLI, JR.  
MATTHEW D. BRINCKERHOFF  
JONATHAN S. ABADY  
EARL S. WARD  
ILANN M. MAAZEL  
HAL R. LIEBERMAN  
DANIEL J. KORNSTEIN  
O. ANDREW F. WILSON  
KATHERINE ROSENFELD  
DEBRA L. GREENBERGER  
ZOE SALZMAN  
SAM SHAPIRO

ATTORNEYS AT LAW  
600 FIFTH AVENUE AT ROCKEFELLER CENTER  
10<sup>TH</sup> FLOOR  
NEW YORK, NEW YORK 10020

TEL: (212) 763-5000  
FAX: (212) 763-5001  
www.ecbawm.com

DIANE L. HOUK  
EMMA L. FREEMAN  
DAVID BERMAN  
HARVEY PRAGER  
SCOUT KATOVICH  
MARISSA BENAVIDES  
NICK BOURLAND  
ANDREW K. JONDAHL  
ANANDA BURRA  
MAX SELVER  
VIVAKE PRASAD  
NOEL R. LEÓN

May 26, 2021

**By ECF**

Hon. Jesse M. Furman  
United States District Judge  
40 Centre Street, Room 2202  
New York, New York 10007

Re: *Accent Delight, et al. v. Sotheby's and Sotheby's, Inc.*, No. 18-CV-9011

Dear Judge Furman:

Plaintiffs seek to file with redactions our response to Defendants' second Swiss Hague request for Yves Bouvier, ECF No. 290, and to file under seal Plaintiffs' proposed additional exhibits. Plaintiffs' redactions to the redlined and clean versions of the request mirror Sotheby's redactions related to Mr. Bouvier's lawsuit in Switzerland, based on the Swiss tribunal's order regarding confidentiality of those proceedings. ECF No. 289. Plaintiffs seek to file their proposed exhibits under seal because they consist of documents produced by the parties under the protective order or by third parties who designated them Attorneys Eyes Only.

Given the number of exhibits, the fact that some were produced by non-parties, the short time frame Plaintiffs had to respond to Defendants' proposed request, and the fact that none of these exhibits are necessary to this Court's decision (but are rather only relevant to the taking of evidence in Switzerland in the event the request is issued) and are hence not judicial documents, we respectfully seek leave to file the exhibits under seal without following the standard procedure laid out in Your Honor's Individual Rules.

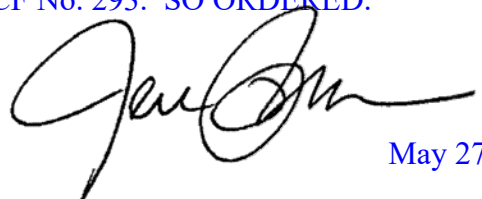
Respectfully,

/s/

Daniel J. Kornstein

c. All counsel of record (*via ECF*)

The motion to seal is GRANTED temporarily. The Court will assess whether to keep the materials at issue sealed or redacted when deciding the underlying motions. The Clerk of Court is directed to terminate ECF No. 293. SO ORDERED.



May 27, 2021